

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor)
to National City Bank,)
Plaintiff,)
v.)
) Glenn Udell; Pamela Udell; Sorrento Enterprises,)
LLC; Sorrento Enterprises, LLC – Series A;)
Sorrento Enterprises, LLC – Series B; Sorrento) Case No. 16 CV 5400
Enterprises, LLC – Series C; Sorrento Enterprises,)
LLC – Series D; Sorrento Enterprises, LLC – Series)
E; Sorrento Enterprises, LLC – Series F; Sorrento)
Enterprises, LLC – Series G; Sorrento Enterprises,)
LLC – Series H; Sorrento Enterprises, LLC – Series)
I; Sorrento Enterprises, LLC – Series J; Sorrento)
Enterprises, LLC – Series K; Sorrento Enterprises,)
LLC – Series L; Sorrento Enterprises, LLC – Series)
M; Sorrento Enterprises, LLC – Series N; Sorrento)
Enterprises, LLC – Series O; Sorrento Enterprises,)
LLC – Series P; Sorrento Enterprises, LLC – Series)
Q; Sorrento Enterprises, LLC – Series R; Sorrento)
Management, Inc. and Chicago Title Land Trust as)
trustee under trust agreement dated May 19, 2008)
and known as trust number 8002350906,)
Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR A ONE-DAY EXTENSION OF TIME
TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS
COUNTS V, VI AND VII OF PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants respectfully move, by and through their attorneys, Brown, Udell, Pomerantz & Delrahim, Ltd., and pursuant to Federal Rule of Civil Procedure 6(b), for an Order granting Defendants a one-day extension of time, to and including March 29, 2017, to file their Reply in Support of Defendants' Motion to Dismiss Counts V, VI and VII of Plaintiff's First Amended Complaint. In support of this motion, Defendants state as follows:

1. Defendants filed their Motion to Dismiss Counts V, VI and VII of Plaintiff's First Amended Complaint on January 31, 2017. (Docket No. 70).

2. Plaintiff filed its Response to Defendants' Motion to Dismiss Counts V-VII of Plaintiff's First Amended Complaint on March 8, 2017. (Docket No. 74).

3. By prior Order of Court, Plaintiff's Reply is due on March 28, 2017. (Docket No. 67).

4. Defendants seek an extension of one day, until March 29, 2017, to file their Reply brief. Although Defendants' reply time was shortened by one day due to Plaintiff seeking and obtaining a one-day extension in the filing of its Response (Docket Nos. 72, 80), the primary reason for Defendants' request for a corresponding one-day extension is that Defendants' counsel was unexpectedly diverted from the finalization of the brief by an emergency matter. That matter consumed several days on an emergency basis the latter half of the week ending March 24, 2017, as it involved the preparation of a Complaint and Motion for Temporary Restraining Order in a departing employee/restrictive covenant case.¹

6. This is the first motion for enlargement of time to file Defendants' Reply brief.

7. Counsel for Plaintiff and Defendants have consulted, and counsel for Plaintiff has advised that Plaintiff has no objection to the granting of the relief requested herein.

8. No party will be prejudiced by this short extension.

9. This motion is made in good faith and not brought for purposes of harassment or undue delay.

WHEREFORE, Defendants respectfully pray that this Honorable Court grant this motion for enlargement of time to file Defendants' Reply in Support of Motion to Dismiss Counts V, VI and VII of Plaintiff's First Amended Complaint to and including March 29, 2017, and for such further relief as the Court finds just and reasonable.

¹ A caption for the emergency matter is not available because, in light of certain further developments in that matter, the case has not yet been filed.

Dated: March 28, 2017

Pamela Udell;
Sorrento Enterprises, LLC;
Sorrento Enterprises, LLC – Series A-R; and
Chicago Title Land Trust as trustee under
trust agreement dated May 19, 2008 and
known as trust number 8002350906,

By: /s/ Andrew A. Jacobson
One of their attorneys

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